

Fig. C-13 Closure



EPA Region 5 Records Ctr.



321535

June 21, 1984

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Rd.
Springfield, IL 62706

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JUN 25 1984

**E.P.A. — D.L.P.C.
STATE OF ILLINOIS**

Attn: Mr. Lawrence W. Eastep

Dear Sir:

In response to your letter dated May 11, 1984 rejecting our closure plan that we had submitted to your office dated April 3, 1984, I am submitting another closure plan that, hopefully, will meet the requirements that your agency have set forth in 35 Ill. Admin. Code 725.210-725.215. As I have stated in the past, the only reason we applied for a permit as a storage facility in the first place is that the sealed containers that we use to collect our baghouse dust take longer than 90 days to fill. Since it cost our company approximately \$1000. each time to dispose of this waste, we felt we could save our company money since it now takes almost 6 months to fill the containers. Instead of dumping half full containers and paying for this unnecessary removal, we would have liked to store the waste until the containers were full, but requiring millions of dollars in bonds to guarantee this cleanup should we ever close prohibits us from being a temporary storage facility.

In response to the five items listed in your letter, I have listed the actions we will take to facilitate compliance to this request. I have also listed these under separate heading of our new closure plan.

1. Storage facility will be closed by dumping said sealed containers into a luger box and transported to permanent storage facility.
2. Since we use sealed containers and there is little chance of escape to the environment, this point is mute. If, by chance, there is an escape on the ground we can easily shovel waste back into the container. We will also keep track of the days between shipments to make absolutely sure that we do not keep any waste in our plant for more than 90 days.
3. We will not decontaminated any structures or equipment because all of the equipment and structures will still be operational and in service. We still will generate hazardous

one

Industry's tool steel service center.

Mr. Lawrence W. Eastep

two

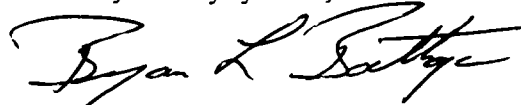
June 21, 1984

waste. We still will collect the waste in our baghouse and sealed containers. We will not store for over that 90 days.

4. The total time for closure is approximately 1 hour. We only have to dump three (3) small containers into one large container for disposal. The one large container is then trucked to the licensed landfill. A schedule for tracking our program would require very little. Our waste hauler would require a telephone call one day before scheduled pickup and then he would send his truck out the next day to haul our waste to the landfill.
5. The certification after closure will be done by a registered professional engineer and the owner.

Hopefully, this new closure plan will meet with your approval and we can put this matter behind us. I will again do nothing until we hear from you regarding our latest plan that we are submitting.

Very truly yours,



Bryan L. Boettger
Manager-Operations

BLB:apr

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STATE OF ILLINOIS

Closure Plan

Dump sealed containers into luger box and transport to disposal facility. Shovel up and dispose of any waste that may have fallen on the ground during dumping.

Keep accurate record of how long dust has accumulated in sealed containers so that it will not accumulate for more than 90 days.

Time required for closure is approximately 1 hour to dump sealed containers. Disposal firm requires 24 hours notice prior to pick-up of waste. Starting date will be approximately 10 days after closure plan approval by the state.

When boxes are dumped, we will have an independent licensed professional engineer come and inspect the containers to make sure they are empty. He will also inspect site to make sure that no dust has escaped into the environment and that all has been safely disposed of by Columbia Tool Steel Company.

Bryan L. Boettger
Manager-Operations
Columbia Tool Steel Company
June 21, 1984

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E.P.A. — D.L.P.C.
STATE OF ILLINOIS